

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Case No.: 24-12201 AMC
ANDREW ROBERT MCLELLAN d/b/a ANDREW ROBERT MCLELLAN, Debtor.	Chapter: 13

**OBJECTION OF NAVY FEDERAL CREDIT UNION TO DEBTOR'S
CHAPTER 13 PLAN**

AND NOW COMES, Navy Federal Credit Union ("Mortgagee"), secured creditor and mortgage lien holder on real property owned by the Debtor and located at 4159 White Horse Road, Malvern, PA 19355 ("the Property"), by its attorneys, Fein, Such, Kahn & Shepard, P.C., Tammy L. Terrell Benoza, Esq., who hereby aver as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on the Property.
2. Debtor filed the instant Chapter 13 Bankruptcy Petition on June 26, 2024.
3. Mortgagee filed a Proof of Claim on July 12, 2024 (claim no. 3).
4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had mortgage arrears totaling \$480,911.66.
5. Debtor's Chapter 13 Plan does not provide for treatment in Part 4 of the Plan for Secured Creditors.
6. The debtor has proposed treatment in Part 9 of the plan. The treatment is unclear and Secured Creditor objects to any treatment that would not result in payment of the full amount of arrears set forth in the filed Proof of Claim as well as post petition payments.

WHEREFORE, Navy Federal Credit Union prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due Mortgagee as outlined in the Proof of Claim filed of record along with ongoing post petition payments.

Dated: July 16, 2024

/s/ Tammy L. Terrell Benozza
Tammy L. Terrell Benozza, Esq.
Court I.d. No. 20271989